

**KJC LAW GROUP, A.P.C.**

Kevin J. Cole (SBN 321555)

*kevin@kjclawgroup.com*

W. Blair Castle (SBN 354085)

*blair@kjclawgroup.com*

9701 Wilshire Blvd., Suite 1000

Beverly Hills, CA 90212

Telephone: (310) 861-7797

*Attorneys for Defendant*

*Van Dyk Baler Corp.*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

EMERGING ACQUISITIONS, LLC (d/b/a  
Bulk Handling Systems),

Plaintiff,

v.

LESLIE WELLS in her official capacity as  
the Deputy Director of the Santa Barbara  
County Resource Recovery and Waste  
Management Division; SANTA  
BARBARA COUNTY; MUSTANG  
RENEWABLE POWER VENUTRES,  
LLC; and VAN DYK BALER CORP.  
(d/b/a Van Dyk Recycling Solutions),

Defendants.

Case No. 8:23-cv-00329-AB-ADS

[Hon. Andre Birotte Jr., Crtrm 7B]

**JOINT STIPULATION TO  
CONTINUE CERTAIN EXPERT  
REPORT DEADLINES**

Filed Concurrently:

1. [Proposed] Order

Complaint Filed: February 23, 2023

Trial Date: October 5, 2026

**STIPULATION**

Subject to the Court’s approval, Plaintiff Emerging Acquisitions, LLC (d/b/a Bulk Handling Systems) (“Plaintiff”) and Defendants Santa Barbara County, Mustang Renewable Power Ventures, LLC, and Van Dyk Baler Corp. (collectively “Defendants”; all together, the “Parties”), through their respective counsel of record, hereby stipulate and agree as follows:

WHEREAS, the Court entered an Order on September 24, 2025, setting pretrial and trial dates. *See* ECF No. 183. Among other deadlines, the Court set the deadline for (i) Initial Expert Reports as December 16, 2025, and (ii) Rebuttal Expert Reports as January 26, 2026. *Id.*

WHEREAS, Defendant Van Dyk Baler Corp. requested a continuance of the deadline for initial expert reports. The Parties have since conferred and submit the following proposed—and limited—amendments to the case schedule (i.e., continuing two expert report deadlines by one week each):

Event	Current Date	Proposed Date
Initial Expert Reports	Tuesday, December 16, 2025	Tuesday, December 23, 2025
Rebuttal Expert Reports	Monday, January 26, 2026	Monday, February 2, 2026

WHEREAS, the Parties believe that this agreed-to extension of time would not affect the timing of the trial or the other remaining pretrial deadlines.

IT IS SO STIPULATED.

DATED: December 9, 2025

**STOEL RIVES LLP**

By: /s/ Vanessa Soriano Power  
Vanessa Soriano Power

*Attorneys for Plaintiff Emerging Acquisitions, LLC*

DATED: December 9, 2025

**ERVIN COHEN & JESSUP LLP**

By: /s/ Kelly W. Cunningham  
Kelly W. Cunningham

*Attorneys for Defendant County of Santa Barbara*

DATED: December 9, 2025

**GREENBERG TRAURIG, LLP**

By: /s/ Michael A. Nicodema  
Michael A. Nicodema

*Attorneys for Defendants Van Dyk Baler Corp.,  
and Mustang Renewable Power Ventures, LLC*

DATED: December 9, 2025

**KJC LAW GROUP, A.P.C.**

By: /s/ Kevin J. Cole  
Kevin J. Cole

*Attorneys for Defendants Van Dyk Baler Corp.*

**ATTESTATION REGARDING SIGNATURES**

I, Kevin J. Cole, attest pursuant to L.R. 5-4.3.4(a)(2)(i) that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

DATED: December 9, 2025

By: /s/ Kevin J. Cole

**CERTIFICATE OF SERVICE**

I certify that on December 9, 2025, I electronically filed the foregoing document(s) with the Court's CM/ECF system, and that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Kevin J. Cole

Kevin J. Cole